



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

December 2, 2021

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Zhao v. Jaddou, No. 21 Civ. 8201 (RA)*

Dear Judge Abrams:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate his Application to Register Permanent Residence or to Adjust Status (Form I-485) and Refugee/Asylee Relative Petition (Form I-730). I write respectfully to request, on behalf of both parties, an on-consent extension of time for the government to respond to the complaint from December 8, 2021, to January 7, 2022. If the Court grants the requested extension, we respectfully request that the December 17, 2021 initial conference be adjourned until the week of January 18, 2022.

Since the government’s November 5, 2021 letter, *see* ECF No. 8, USCIS has approved the Form I-485 and is in the process of transferring the file for the Form I-130 to the Queens Field Office (due to a change in the plaintiffs’ residence) so that an interview can be scheduled. The parties anticipate that they will submit a stipulation and proposed order of dismissal without prejudice once the interview is scheduled. The parties thus respectfully submit that the requested extension and adjournment are in the interests of efficiency and conservation of judicial and party resources. This is the second request to adjourn the initial conference¹ and first request to adjourn the government’s deadline to respond to the complaint. The plaintiff joins in these requests.

I thank the Court for its consideration of this letter.

Application granted. The initial conference is adjourned to January 20, 2022 at 4:30 p.m. The joint status letter is due by January 13, 2022. The parties shall use the following dial-in information to call into the conference: Call-in Number: (888) 363-4749; Access Code: 1015508. This conference line is open to the public.

SO ORDERED.

Hon. Ronnie Abrams

12/3/2021

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Counsel of record (via ECF)

¹ On November 5, 2021, the parties jointly requested an adjournment of the initial conference, which the Court granted. *See* ECF Nos. 8, 9.